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Memorandum in Support

Plaintiff Lentz asks the Court to allow her an additional week to respond to Defendants' motion for leave to renew its filing for summary judgment. In support, Plaintiff states as follows:

1. On February 22, 2005, Defendants, by counsel, filed a motion for leave to file a renewed motion for summary judgment.
2. Pursuant to S.D. Ohio Local Rule 7.2(a)(2), Plaintiff's response is due March 15, 2005.
3. Plaintiff respectfully asks this Court for an additional seven (7) days in which to file her response.
4. Counsel for Plaintiff, Michael K. Sutherlin, has recently moved offices and is devoting substantial time to the process of setting up the new office space.
5. Counsel for Plaintiff, Lynn D. Pundzak, is on an expedited trial schedule in the case of Gunning & Associates Marketing, Inc. v. Popper, Case No. A0500809, in the Court of Common Pleas, Hamilton County, Ohio, and trial is expected to begin in approximately two weeks.
6. This motion is not made for the purposes of vexation or delay.
7. Counsel for Plaintiff, Lynn D. Pundzak, contacted opposing counsel, Deborah S. Adams regarding this motion. Ms. Adams indicated she would not object to a seven (7) day extension of time.

WHEREFORE, Plaintiff, by counsel, respectfully moves the Court to grant the motion for an extension of time in which to file her response to Defendants' motion for

leave to file renewed motion for summary judgment up to, and including, March 22, 2005.

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of March 2005, a copy of the foregoing was filed electronically. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

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